

VIRGINIA:

IN THE CIRCUIT COURT OF STAFFORD COUNTY

LENNART GROSS,

Plaintiff,

v.

CHRISTIAN SAGALA,

Serve: Richard D. Holcomb, Commissioner  
Department of Motor Vehicles  
Office of the Commissioner  
230 West Broad Street  
Richmond, VA 23269

And

TRANSPORT SOUTH BEC EXPRESS,  
INC. a/k/a QUEBEC TRANSPORT  
COMPANY

Serve: Secretary of the Commonwealth  
of Virginia  
1111 East Broad Street  
4<sup>th</sup> Floor  
Richmond, VA 23219

And

JOHN DOE

Defendants.

Case No.: CL21003237-00

FILED  
CLERK OF COURT  
2021 OCT -8 P 12:12  
STAFFORD COUNTY, VA

COMPLAINT

TO THE HONORABLE JUDGES OF THE AFORESAID COURT:

COMES NOW, Lennart Gross, by counsel, and moves this Honorable Court for a Judgment and Award of Execution against the defendants, Christian Sagala and Transport South Bec Express, Inc. a/k/a Quebec Transport Company jointly and severally, in the sum of THREE MILLION DOLLARS, (\$3,000,000.00), representing compensatory damages for the following reasons, to-wit;

1. Upon information and belief defendant Transport South Bec Express, Inc. a/k/a Quebec Transport Company (hereinafter referred to as "Quebec Transport") is a corporation organized and existing under the laws of Canada.

2. That on or about September 28, 2020, at approximately 8:45 p.m., the plaintiff, Lennart Gross, was operating his 2000 Pontiac automobile in the right lane of I-95 South approximately 3/10 of a mile south of Route 610 in Stafford County, Virginia, and;

3. That at the same time, place and date the defendant, Christian Sagala, was operating a 2017 Kenworth Truck traveling in the middle lane of I-95 South approximately 3/10 of a mile south of Route 610 in Stafford County, Virginia, on or about September 28, 2020, at approximately 8:45 p.m., at the request and benefit for the defendant, Quebec Transport Company and that the defendant, Christian Sagala, operated said vehicle as an agent and employee for defendant, Quebec Transport Company, by and with defendant, Quebec Transport Company's permission and within the scope of defendant Christian Segala's authority and employment, so as to cause the collision with plaintiff's vehicle, and;

4. That at the same time, place and date, the defendant Christian Sagala operated his vehicle in a careless, reckless, and negligent manner so as to cause the collision between their vehicles, thereby injuring the plaintiff, and;

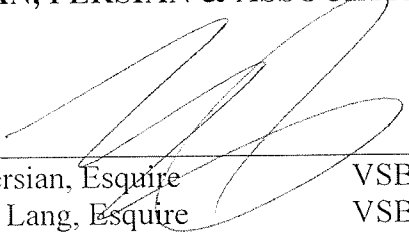
5. That by reason of and as a direct and proximate result of which the plaintiff received severe and permanent injuries, has undergone great physical pain and anguish, medical expenses, lost wages and in the future will be caused to suffer physical pain, medical expense, lost wages and anguish, and;

6. That by reason of and as a direct and proximate result of which the plaintiff has sustained damages in the extent of THREE MILLION DOLLARS, (\$3,000,000.00).

WHEREFORE, the plaintiff prays that he be granted a judgment against the defendants, Christian Sagala and Transport South Bec Express, Inc. a/k/a Quebec Transport Company, jointly and severally, in the amount of THREE MILLION DOLLARS, (\$3,000,000.00), representing compensatory damages for the negligence aforesaid and costs in this behalf expended and interest from the date of the cause of action pursuant to Section 8.01-382 of the Code of Virginia, 1950, as amended.

A trial by jury is demanded.

**SHERIDAN, PERSIAN & ASSOCIATES, PLLC**



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